



Judy Y. Lee  
*Attorney*

February 5, 2004

**VIA OVERNIGHT AND ELECTRONIC MAIL**

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Second Floor  
Boston, MA 02110

Re: D.T.E. 03-98 – Petition of Towns of Franklin and Swampscott

Dear Secretary Cottrell:

On behalf of Massachusetts Electric Company (“Company”), I am enclosing for filing one (1) original and eight (8) copies of the First Set of Information Requests of the Company to Petitioners in D.T.E. 03-98. Thank you very much for your time and attention to this matter.

Very truly yours,

Judy Y. Lee

cc: William Stevens, Hearing Officer  
Jody Stiefel, Legal Division  
James Byrnes, Rates and Revenues Requirements Division  
Joseph Passaggio, Rates and Revenues Requirements Division  
Sean Hanley, Rates and Revenues Requirements Division  
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FIRST SET OF INFORMATION REQUESTS OF  
MASSACHUSETTS ELECTRIC COMPANY TO PETITIONERS  
DOCKET NO. D.T.E. 03-98

Massachusetts Electric Company hereby submits to Petitioners the following information requests with respect to the above-captioned matter.

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by Massachusetts Electric Company to Petitioners in this proceeding.

1. “Company” or “MECO” means Massachusetts Electric Company and Nantucket Electric Company, its officers, directors, employees, consultants, and attorneys.
2. “Towns” or “Petitioners” means the towns of Franklin and Swampscott.
3. “Petition” means the petition for dispute resolution filed by the Towns of Franklin and Swampscott, pursuant to G.L. c. 164, § 34A, to resolve a dispute between the Towns and Massachusetts Electric Company and Nantucket Electric Company, filed on October 17, 2003.
4. “MECo Response” means the November 10, 2003 Answer of Massachusetts Electric Company, pursuant to 220 C.M.R. § 1.04(2), to the Petition for dispute resolution by the Towns.
5. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
6. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
7. These requests shall be deemed continuing so as to require further supplemental responses if the Petitioners or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
8. The phrase “provide complete and detailed documentation” means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.

9. The term “document” or “documentation” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
10. If the Petitioners find that any of these requests is ambiguous, please notify the Company so that the requests can be clarified prior to the preparation of a written response.
11. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) Jody Stiefel, Legal Division; (3) James Byrnes, Rates and Revenues Requirements Division; (4) Joseph Passaggio, Rates and Revenues Requirements Division; (5) Sean Hanley, Rates and Revenues Requirements Division; (6) Amy Rabinowitz, Massachusetts Electric Company; and (7) Judy Lee, Massachusetts Electric Company. In addition to filing, please submit responses by e-mail to [dte.efiling@state.ma.us](mailto:dte.efiling@state.ma.us) and to [william.stevens@state.ma.us](mailto:william.stevens@state.ma.us).

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MASSACHUSETTS ELECTRIC COMPANY TO PETITIONERS  
DOCKET NO. D.T.E. 03-98

Massachusetts Electric Company hereby submits to Petitioners the following information requests with respect to the above-captioned matter.

1. Referring to the Petition, Exhibit B [3/11 letter], page 4, section heading in bold near the bottom of the page that begins, “Regarding the Discrepancy between the National Grid Purchase Prices Calculated pursuant to D.T.E. 98-89 and D.T.E. 02-25 [sic],” please provide the basis for your statement that a discrepancy exists between the Company purchase price calculation pursuant to D.T.E. 98-89 and D.T.E. 01-25. Include all supporting documentation.
2. Referring to the Petition, Exhibit B [4/1 letter], page 6, second paragraph, second sentence, please provide the basis for your statement that the Company has provided vintage information to other communities. Include all supporting documentation.
3. Referring to the Petition, Exhibit B [8/14 letter], page 25, fourth paragraph, please provide the basis to support the alleged “first fact. . . that most, if not all of private streetlight additions occurred after 1970.” Include all supporting documentation. In addition, if the basis comes all or in part from oral conversations, please provide the name of each individual who provided information, his or her role within town government, and the information provided by that individual.
4. Referring to Exhibit C [7/23 letter], page 166, second to last paragraph, please describe in detail each “reasonable assumption” you made “[i]n the absence of receiving the information requested regarding carryover balances in 1964 and the vintage of the municipal and private streetlights.” Provide all supporting documentation. In addition, if the basis comes all or in part from oral conversations, please provide the name of each individual who provided information, his or her role within town government, and the information provided by that individual.
5. Is it the Towns’ position that the purchase price may be negotiated? If so, please provide the basis for that position. Please include in your discussion the effect of D.T.E. precedent in streetlight purchase proceedings, including but not limited to D.T.E. 01-25.
6. Referring to the Petition, Exhibit B [8/14 letter], page 26, third paragraph, for each Town, please provide the documentation and work papers to support your proposal that 90% of streetlight additions since the completion of the sodium vapor conversion be allocated to private street lighting and 10% to municipal lights. In addition, if the basis comes all or in part from oral conversations, please provide the name of each individual who provided information, his or her role within town government, and the information provided by that individual.

7. Please provide a copy of Franklin's policy and procedure for the proposal, construction, and acceptance of new streets within the town.
8. Please provide a copy of Swampscott's policy and procedure for the proposal, construction, and acceptance of new streets within the town.
9. Please provide a copy of Franklin's policy and procedure relating to street lighting activity within the town. In your response, please address the processes for new commercial and residential developments and established areas. Please describe the process for making changes to existing street lighting, and tracking information about such changes within Franklin.
10. Please provide a copy of Swampscott's policy and procedure relating to street lighting activity within the town. In your response, please address the processes for new commercial and residential developments and established areas. Please describe the process for making changes to existing street lighting, and tracking information about such changes within Swampscott.
11. Is it the Towns' position that purchase prices for streetlights should be calculated in the same manner and using the same methodology for all towns requesting a purchase price in order to purchase the streetlights from Mass. Electric? If not, please explain why in detail.
12. Will the Town of Franklin purchase the streetlights at the purchase price provided by the Company if the Department finds that the Company's methodology for calculating the purchase price is correct?
13. Will the Town of Swampscott purchase the streetlights at the purchase price provided by the Company if the Department finds that the Company's methodology for calculating the purchase price is correct?
14. Please provide a complete list of witnesses that the Towns intend to call at the evidentiary hearing in this matter. For each witness, please state the subject matter of the testimony and provide a copy of all evidence and exhibits that the witness will sponsor.